

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In re: PHARMACEUTICAL INDUSTRY)	
AVERAGE WHOLESale PRICE)	MDL No. 1456
LITIGATION)	Civil Action No. 01-12257-PBS
_____)	
)	Subcategory No. 06-11337-PBS
THIS DOCUMENT RELATES TO:)	
)	Hon. Patti B. Saris
<i>United States of America ex rel. Ven-a-Care of</i>)	
<i>the Florida Keys, Inc. v. Dey, Inc., et al., Civil</i>)	
Action No. 05-11084-PBS)	

ADDENDUM

TO

**UNITED STATES' CONSOLIDATED MEMORANDUM OF LAW IN SUPPORT
OF CROSS-MOTION FOR PARTIAL SUMMARY JUDGMENT AND IN OPPOSITION
TO THE DEY DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT**

Summary of Spreads Between Dey AWP's and Average Price for Pharmacy Class of Trade based on Dey Indirect Transaction Data as calculated by StoneTurn, LLC

	1993	1995	1997	1999	2001	2003	2005	2007
Albuterol Inhalation Aerosol 17 gm (90 mcg Aerosol Inhaler)		73.6%	413.2%	636.3%	378.7%	408.9%		
Albuterol Inhalation Aerosol (refill) 17 gm			405.5%	575.9%	512.2%			
Albuterol Inhalation Solution 0.5%, 20 ml			189.4%	256.8%	294.9%	364.8%		
Albuterol Sulfate 0.083% 3 ml, 25s	98.9%	180.0%	259.3%	383.5%	586.5%	823.5%	1050.5%	1193.5%
Albuterol Sulfate 0.083% 3 ml, 30s		166.7%	262.1%	381.4%	610.5%	835.7%	1088.9%	1223.1%
Albuterol Sulfate 0.083% 3 ml 60s	87.3%	180.8%	262.6%	385.4%	616.7%	860.9%	1110.5%	1246.1%
Cromolyn Sodium 2 ml 120s		50.3%	90.9%	150.4%	300.9%	415.4%	367.0%	
Cromolyn Sodium 2 ml 60s		47.5%	88.9%	149.6%	300.7%	405.8%	424.7%	341.4%
Ipratropium Bromide 0.02 % 2.5 ml, 25's			129.1%	203.2%	369.3%	710.7%	1359.3%	1690.7%
Ipratropium Bromide 0.02 % 2.5 ml, 30's			139.9%	208.5%	361.9%	760.5%	1044.6%	1298.6%
Ipratropium Bromide 0.02 % 2.5 ml, 60's			129.9%	209.2%	376.1%	755.8%	1564.7%	1699.8%

Spreads listed above are representative examples from the Summaries A1 through A13 of the affidavit of Simon D. Platt.